

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re:

FLOYD EUGENE BUCKLEY  
EVELYN GRACE BUCKLEY

TRUSTEE'S OBJECTION  
TO 362(d) RELIEF FROM  
STAY

BK No.: 18-21238

Debtors.

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DOUGLAS J. LUSTIG, the undersigned Chapter 7 Trustee for the above-named Debtors objects to the 362(d) Relief from Stay for the following reasons:

1. There appears significant equity in the property located at 6880 Boot Jack Hollow Road, Bath, New York 14810 (estimated at \$90,000.00 less \$73,478.00 liens - \$16,522.00 equity);
2. There is no basis of value other than Debtors' schedules which is unacceptable to establish value for the Trustee's purpose.
3. The Debtors are not claiming a exemption;
4. The Trustee is seeking additional time to liquidate the property.

**WHEREFORE**, the Trustee respectfully requests the motion be denied, adjourn the motion or for such other and further relief as the Court deems just, proper and equitable.

Dated: January 22, 2019

/s/Douglas J. Lustig  
DOUGLAS J. LUSTIG, TRUSTEE